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Attorneys for Defendant Wynn Las Vegas, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HELEN SWARTZ, Individually,

Plaintiff,

v.

WYNN LAS VEGAS, LLC, a Nevada
Limited Liability Company,

Defendant.

Case No.: 2:20-cv-00430-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

(Second Request)

Plaintiff Helen Swartz ("Plaintiff") and Defendant Wynn Las Vegas, LLC ("Wynn") (together, the "Parties"), by and through their respective counsel, hereby stipulate and agree to the following:

1. Wynn was served with Plaintiff's Complaint on March 3, 2020;
2. On March 23, 2020, the Parties stipulated and agreed to extend the deadline for Wynn to answer, move or otherwise respond to Plaintiff's Complaint to April 23, 2020. An Order extending the time for Wynn to respond to Plaintiff's Complaint was subsequently entered by the Court on March 25, 2020.
3. The Parties have agreed to continue the deadline for Wynn to respond to Plaintiff's Complaint by an additional eleven (11) days, up to and including May 4, 2020;

4. Wynn seeks additional time to respond to Plaintiff's Complaint in light of the ongoing Coronavirus outbreak, the closure of Wynn's properties and the limited availability of Wynn employees and representatives to consult with counsel regarding the preparation of a responsive pleading in this matter;

5. Although Wynn previously requested an extension of the deadline to answer, move or otherwise respond to the Complaint, both extensions have been primarily due to challenges imposed by the Coronavirus outbreak, and the subsequent limited availability of Wynn's employees and representatives.

Nothing in this stipulation shall be construed as a waiver or relinquishment of any party's rights, remedies, objections, or defenses, all of which are expressly reserved. This stipulation is submitted in good faith and not for the purpose of delay.

Dated this 22nd day of April, 2020.

SEMENZA KIRCHER RICKARD

/s/ Lawrence J. Semenza, III, Esq.

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Attorneys for Defendant Wynn Las Vegas, LLC

Dated this 22nd day of April, 2020.

FULLER, FULLER & ASSOCIATES, P.A.

/s/ Lawrence A. Fuller, Esq.

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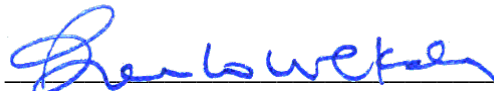
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ORDER

IT IS HEREBY ORDERED THAT, the time for Wynn to respond to Plaintiff's Complaint is hereby extended by eleven (11) days, up to and including May 4, 2020.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 4/23/2020

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